Am. Dec. 730; *Moore* v. *Dunning,* 29 Ill. 130, 81 Am. Dec. 301; *Franklin* v. *Coffee,* 18 Tex. 413, 70 Am. Dec. 292. See note to *Pryor* v. *Stone,* 70 Am. Dec. 344. Also note to *Taylor* v. *Hargous,* 60 Am. Dec. 607. The latter note gives an exhaustive treatment of the subject.

HUSBAND AND WIFE—TESTAMENTARY CAPACITY OF WIFE—AFTER ACQUIRED PROPERTY.—Testatrix, who had been made a beneficiary under a trust deed, by her will devised the property to her husband. A statute provided that a person might dispose by will of any estate to which he shall be entitled at his death, notwithstanding he may become so entitled subsequent to the execution of the will. In a suit to contest the validity of the will it was *held,* that a married woman who had no separate estate at the time of making her will, had the capacity to dispose of an estate subsequently acquired and owned by her at her death. *Tarrant et al* v. *Core et al.* (1907), — Va. —, 56 S. E. Rep. 228.

The decision in this case raises a nice question as to the right of a married woman to dispose of her equitable separate estate independent of statute. In taking the view that a married woman with respect to her equitable estate is sui juris, and has the same right of disposition as a feme sole, the Virginia court is probably sustained by the weight of both American and English authority, the point having been settled by the decision in *Taylor* v. *Meads,* 34 Law J., N. S. Chap. 203, which has since been followed. By settled rule of the common law, no one could devise lands which he did not own, and had no interest in, at the time of the execution of the will, and it followed that lands acquired subsequently did not pass. *Brewster* v. *McCall,* 15 Conn. 274; *Quinn* v. *Hardenbrook,* 54 N. Y. 83; *Girard* v. *Philadelphia,* 4 (Rawl) Penn. 323. Statutes have now been enacted in a majority of the states, by which the power to dispose of after-acquired property has been conferred in general terms, and it has repeatedly been held that these statutes are broad enough to include the will of a married woman. *In re Tullers Will,* 79 Ill. 99; *Buchanan* v. *Turner,* 26 Md. 1; *Schull* v. *Murray,* 32 Md. 9; *Wadhams* v. *American Home Missionary Society,* 12 N. Y. 415; *Johnson* v. *Sharp,* 44 Tenn. 45; *Smith* v. *Thompson,* 2 McArthur D. C. 291.

INJUNCTION—RESTRAINT OF POLICE DEPARTMENT—INJURY TO BUSINESS.—Plaintiff is a licensed hotel keeper at Arverne within the city limits of New York. The defendants are police officials. On the ground of a suspicion of gambling three policemen came every day for three weeks to plaintiff's hotel in the evening and demanded that plaintiff conduct them through the hotel for the purposes of inspection. Moreover, they often came after midnight, opened all bedrooms and awakened the guests. An officer was stationed at the door who stopped persons about to enter and either warned them or forbade entry. *Held,* that plaintiff was entitled to an injunction restraining further interference. *Olms* v. *Bingham et al.* (1907), 101 N. Y. Supp. 1106.

The court, in its opinion, said that the opportunity of extortion on the part of policemen should be restrained. Equity seems to be loath to interfere with the police as in *Prendville* v. *Kennedy,* 34 How. Pr. (N. Y.) 416, the